

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

Defenders of Wildlife, et al,)
)
 C/A No.: 2:22-cv-0112-RMG
Plaintiffs,)
)
v.)
)
Robert H. Boyles, Jr., et al,)
)
)
Defendants.)
)

**CONSENT MOTION TO EXTEND TIME TO DISCLOSE PLAINTIFFS' WRITTEN
EXPERT REPORT**

Pursuant to Rule 6(b) of the Federal Rules of Civil Procedure and Rule 6.01 of the Local Rules of the United States District Court for the District of South Carolina (D.S.C.), Plaintiffs Defenders of Wildlife and South Carolina Coastal Conservation League (“Plaintiffs”) respectfully move this Court for just over a two-month extension (77 days) of the December 20, 2022, deadline for Plaintiffs to disclose written expert reports to the parties. The proposed date of the new deadline is March 6, 2023. This deadline has not previously been extended. The requested extensions would similarly affect subsequent deadlines but only by the same magnitude as originally set by this Court. This consent motion is made on the following grounds:

Discovery has moved at a slower pace than contemplated in the initial Scheduling Order entered by the Court. To date, Plaintiffs have received approximately 700 documents combined from both Defendants, and believe additional documents are necessary for Plaintiffs’ experts to formulate their opinions and write their reports. As such, the parties need additional time to complete document discovery, and for any necessary motions to resolve discovery disputes between the parties. Accordingly, good cause exists to support this requested extension.

Consistent with Local Rule 7.02, Counsel for Plaintiffs has consulted with Counsel for Defendant South Carolina Department of Natural Resources and with Counsel for Defendant Charles River Laboratories International, Inc., and is authorized to represent that both Defendants consent to the extension. By email, the parties are transmitting a Proposed Amended Scheduling Order to chambers to reflect this and subsequent proposed deadline extensions.

Dated: December 9, 2022

Respectfully submitted,

s/ Catherine M. Wannamaker
Catherine M. Wannamaker
Bar No. 12577
Southern Environmental Law Center
525 E. Bay St., Ste. 200
Charleston, SC 29403
cwannamaker@selcsc.org
Telephone (843) 720-5270